

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

KIMBERLY L. COX

PLAINTIFF,

V.

MEGAN J BRENNAN, Postmaster General of the United States, U.S. Postal Services,

Defendant.

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CIVIL NO. 2:14-cv-00810-JRG-RSP

PLAINTIFF'S TRIAL WITNESS LIST- EXHIBIT A

Plaintiff, Kimberly L. Cox, pursuant to the Court's Docket Control Order entered in this case, files this Trial Witness List for identification and categorization of trial witnesses.

At this time, Plaintiff identifies the following witnesses for trial:

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Anderson, Sandra	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes	X		

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Bates, Glenda	Worked at the Estate Sale at issue. Has knowledge of what she observed while working at the estate sale. Has knowledge of her statements which she provided to Postmaster Joe McQuiston at his request.	30 minutes		X	
Booth, Jeff	Employed by the Defendant. Was assigned to Kilgore, but is now assigned to another office in Texas. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Buchanan, Stanley	NALC Representative; National Business Agent's Office, Dallas Region #10. Has knowledge of Plaintiff's termination and the grievance G06N-4G- D13009603 and the arbitration hearing.	45 minutes	X		
Cameron, Chris	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Chamberlain, Charlie	Former Employee of Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Cox, Kimberly	Plaintiff. Has knowledge of all matters at issue in this case.	2 hours	X		
Cox, Phillip	Plaintiff's spouse. Has knowledge of his wife's physical condition, what she bought at the auction, and his personal inquiries as to what occurred. He also has knowledge of his wife's damages.	30 minutes	X		
Freeman, Cynthia	Former Supervisor and employee at the Kilgore Post Office. Identified as a discriminating management official who created a racial/gender hostile environment. Has knowledge of all of her actions at issue in this lawsuit.	1 hour	X		
Fryar, Efren	Employed at the Kilgore Post Office. Knowledge that male employees were treated more favorable and has knowledge of the hostile environment and retaliation.	30 minutes	X		

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Dr. Gratton Custodian of Records	Has knowledge of the Plaintiff's medical records.	20 minutes		X	
Good Shepherd Medical Center Custodian of Records	Has knowledge of the Plaintiff's medical records.	20 minutes		X	
Hinson, Robert	NALC Representative. Lone Star Branch in Dallas Texas. Has knowledge of his interactions with management concerning the Plaintiff's termination at issue and the steps he took to have the termination rescinded.	30 minutes		X	
Hooks, Sheila	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes	X		

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Knobel, Rachel	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Knobel, Rachel	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Lopez, Angie	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Longview Occupational Custodian of Records	Has knowledge of the Plaintiff's medical records.	20 minutes		X	
Maglaris, Laura	Employed at the Kilgore Post Office. Union Steward. Has knowledge of the retaliatory actions against the Plaintiff and the hostile environment.	30 minutes	X		

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
McCann, Jeff	Former Employee of the Kilgore Post Office. Has knowledge that male employees were treated more favorable. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
McQuiston, Joe	Postmaster of the Kilgore Post Office at all times at issue. Identified as a discriminating and retaliatory management official. Has knowledge of all of his actions at issue in this lawsuit.	1 hour	X		
McShan, Dr. Michael Custodian of Records	Has knowledge of the Plaintiff's medical records.	20 minutes		X	
Reave, Cindy	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Ryan, Martha	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Sartors, Ronnie	Former USPS employee. Has knowledge of what he observed the day of the auction at issue in the Plaintiff's termination and statements that he gave, as well as what he informed the Plaintiff's husband, Phillip Cox.	20 minutes	X		
Smitherman, Karen	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes	X		
Spencer, Nancy	Worked at the Estate Sale at issue. Has knowledge of what she observed while working at the estate sale. Has knowledge of her statements which she provided to Postmaster Joe McQuiston at his request.	30 minutes		X	
Counselor Stalker Custodian of Records	Has knowledge of the Plaintiff's medical records.	20 minutes		X	
Tarango, Elena	Employed at the Kilgore Post Office. Has knowledge that upon the Plaintiff's return to work she continued to be subjected to a hostile environment and retaliation.	30 minutes		X	
Ward, May	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	

WITNESS NAME	SUBSTANCE OF TESTIMONY	EXPECTED DURATION OF TESTIMONY	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Watson, David	Employed at the Kilgore Post Office. Knowledge that male employees were treated more favorable. May have knowledge of the hostile environment and retaliation.	30 minutes		X	
Watson, Kelly	Employed at the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes		X	
Wood, Christina	Former Employee of the Kilgore Post Office. Has knowledge of the gender/race hostile environment created by Supervisor Cynthia Freeman and Postmaster Joe McQuiston. Has knowledge that Postmaster McQuiston had knowledge of the hostile environment. Also has knowledge of the retaliatory actions against the Complainant.	30 minutes	X		

Plaintiff reserves the right to supplement her Witness List as needed, and to conduct cross-examination of all witnesses called by Defendant to testify.

Respectfully submitted,
/s/ Rebecca L. Fisher

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KIMBERLY L. COX

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2017, I electronically served a copy of this document on the attorney for the Defendant by use of the Court's CM/ECF system.

/s/ Rebecca L. Fisher
Rebecca L. Fisher